1 AARON D. FORD Nevada Attorney General 2 HEATHER B. ZANA, Bar No. 8734 Deputy Attorney General State of Nevada 3 Bureau of Litigation Public Safety Division 4 100 N. Carson Street Carson City, NV 89701-4717 5 Tel: (775) 684-1261 E-mail: hzana@ag.nv.gov 6 7 Attorneys for Defendants Renee Baker, and Eugene Murguia 8 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 DARIN J. FRANKLIN. Case No. 3:15-cv-00196-RCJ-WGC 12 Plaintiff. STIPULATION AND REQUEST TO 13 EXTEND DEADLINES (FIRST REQUEST) 14 TANIA ARGUELLO, et al., 15 Defendants. 16 IT IS HEREBY STIPULATED by and between Plaintiff, Darin J. Franklin, in proper person, and 17 Defendants, Renee Baker and Eugene Murguia, by and through counsel, Aaron D. Ford, Attorney 18 General of the State of Nevada, and Heather B. Zana, Deputy Attorney General, pursuant to FRCP 26(f) 19 and Local Rule 26-1(e), that the deadline for the Joint Pre-Trial Order by at least forty-five (45) days, with 20 the deadline being April 30, 2019, subject to this Court's approval. 21 The Parties seek to modify the Scheduling Order and following Orders to extend the deadline. 22 (ECF No. 134) for the Joint Pre-Trial Order (JPTO). Both parties stipulate to this request. 23 It should be noted that Plaintiff and Defense Counsel are in active negotiations in an attempt to 24 settle this matter. Both parties are requesting additional times in hopes that a JPTO and Trial will become 25 unnecessary. Both parties believe that a continuance of the JPTO date is reasonable. 26 The following is a list of upcoming deadlines and the parties' proposed extended deadlines. (ECF 27 No. 134).

28

1	cheduled event	iment Deathne	Peoposed Devalue
2	Proposed Joint Pretrial M	arch 15, 2019	April 30, 2019
3	Order		Total water and address the property of the control
4			
5	WHEREFORE, the parties respectfully request that this Court extend the joint pretrial order		
6	deadlines by the above-referenced schedule.		
7	Respectfully submitted:		
8	Respectfully submitted:  DATED this 12 day of MAR at , 2019.  DATED this 3 day of MAR at , 2019.		
9	2019.		
10		AARON D. FORI	
11		Attorney General	
12	De ton a delivered	_ ву:	
13	paim J. Frankin	Heather B.	Zana orney General
14	Plaintiff in proper person	Attorneys fo	or Defendants/Renee Baker,
15	and Eugene Murguia		
16		IT IS SO ORDERED.	
17		William G. (	obb
18	THE HONORABLE WILLIAM G. COBB United States Magistrate Judge		
19	1		
20		<b>DATED</b> :March 14, 20	19
21			
22			
23			
24 25			
25 26			
26 27			